

MEMO ENDORSED

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March 28, 2023

VIA EMAIL

The Honorable Valerie E. Caproni
United States District Judge
Thurgood Marshall
United States Courthouse
40 Foley Square
New York, New York 10007

Re: *United States v. Wahab, et al.*, No. S7 21 Cr. 603 (VEC)

Dear Judge Caproni:

We write pursuant to Rule 3(A) of Your Honor's Individual Practices in Criminal Cases to request permission to redact certain confidential and sensitive information from our sentencing submission and to file certain exhibits under seal. Specifically, we seek to redact private medical information and to redact and/or file under seal any exhibits that reference or include this information. Attached hereto and filed under seal are excerpted medical records that form the basis of this request. We also seek to file under seal exhibits containing the information of minors and to redact any exhibits that contain private personal contact information, including addresses, email addresses, and phone numbers.

We are making this request because of the sensitive nature of the personal medical information at issue and to protect the privacy of minors and the general privacy of personally identifiable information. The government does not object to this request.

Application GRANTED as to the confidential medical information, the contact information of letter authors, and the names of minor children. The Court finds, however, that the redactions of Mr. Schaffer's and Ms. Oliver's business titles, as well as Ms. Oliver's public website, are overbroad as these items do not contain personal information.

SO ORDERED.



03/29/2023

HON. VALERIE CAPRONI
UNITED STATES DISTRICT JUDGE

Very truly yours,

/s/

Matthew Laroche

MILBANK LLP